COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Blue Ridge Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Owens-Brockway Glass Container Inc.
29 Glass Blower Lane - Ringgold, Pittsylvania County, Virginia
Permit No. BRRO30718

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Owens-Brockway Glass Container Inc. has applied for a Title V Operating Permit for its Ringgold facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____ Date: July 26, 2012
Keith Sandifer
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Deputy Regional Director: _____ Date: July 26, 2012
Robert J. Weld

FACILITY INFORMATION

Owens-Brockway Glass Container Inc.
29 Glass Blower Lane
Ringgold, VA 24586

Facility
Owens-Brockway Glass Container Inc.
29 Glass Blower Lane
Ringgold, VA 24586

County-Plant Identification Number: [51 - 0143 - 0100]

SOURCE DESCRIPTION

NAICS Code:327213 - GLASS CONTAINER MANUFACTURING

Facility Description: SIC Code [3221] – container glass manufacturing - Glass containers are manufactured from recycled glass (postconsumer and inhouse process recycle) and other raw materials. The plant includes the following specific processes: raw material and cullet receiving and storage, raw material blend/mix, glassmelting furnace, glass forming, final bottle treatment and packaging.

Raw Material and Cullet receiving and storage - The facility receives raw materials via truck and rail and stockpiles them in a storage area. The solid raw materials (e.g., sand, salt cake, limestone and soda ash) are conveyed from the truck or rail unloading area to a bucket elevator, which deposits them into silos. A crusher is utilized to size the cullet, then it is screened and the oversize particles are recycled. Postconsumer and inhouse crushed cullet glass pieces to be used in the recycling process is transported by bucket elevators to the silos.

Raw Material Blend/Mix – The solid raw materials for the next batch of glass are transported via conveyors and chutes from the respective silos to the sand scale, major scale and minor scale to be measured. Then the materials are conveyed into the mixer and then on the mixed batch surge hopper. Further transfer is via a vibratory conveyor, mixed batch bucket elevator and a belt conveyor to the batch storage bins, which feed the glass furnace. The silos, scales and conveyors are equipped with dust collectors.

Glass melting furnace – The facility has one furnace (Ref. 1-A) which produce the melt used in the glass forming step. The primary fuel for the furnace is natural gas. The furnace is also fitted with electric boost systems that add to the heat applied to the melt without increasing fuel usage. The furnace is equipped with refiners and forehearths that prepare the glass melt for the forming process. The refiners and forehearths are also fired with natural gas.

Glass Forming – Bottle forming machines shape the glass melt using processes of shearing, gobbing and the final forming. The bottle molds must be continually maintained to produce satisfactory bottles. Preparation of the molds consists of mold repair, cleaning lubricating, curing and heating. Periodic mold swabbing is performed as part of the continuous mold maintenance process. The bottle annealing process is accomplished in a moving bed kiln called a lehr; two each per furnace. The lehrs are fired with natural gas. Molded glass is treated in the Hot End Surface Treatment (HEST) process where monobutyltin trichloride (MBTT) is applied as a mist. The material forms a coating of tin oxide on the outer surface of the bottles which enhances lubricity during subsequent processing. Further down the line, a Cold End Surface Treatment consists of spraying a dilute solution of polyethylene emulsion on the bottles.

Final Bottle Treatment and Packaging – During the final processing, a bottle coding machine prints the date on the bottles and then they are packaged in cardboard boxes with coded numbers to identify the contents.

Owens-Brockway is a Title V major source of SO_2, NO_x, and PM. CO_2e emissions are less than 100,000 tons per year. The source is located in an attainment area for all pollutants. The facility has the potential to operate twenty-four (24) hours per day, seven (7) days per week, and fifty-two (52) weeks per year.

The facility is currently permitted under a NSR Permit issued on April 6, 2001 for the container glass manufacturing facility and on December 14, 2005 for the glass container hot end surface treatment operation (HEST).

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, was conducted August 10, 2011. On February 24, 2011 stack performance tests were conducted for PM, PM-10, NOx, and CO from the glass melting furnace [Ref. 1-A], to determine compliance with the emission limits contained in Condition IV. A.6. of the Title V permit dated September 6, 2006.
In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment							
B-1	001	North American Boiler (1978)	14.6 MMbtu/hr	-	-		4/6/2001
Glass Manufacturing Process							
1-A	003	Furnace A (1978)	99 MMbtu/hr				4/6/2001
13		Silos/Batch House		Fabric Filters	Baghouse-1-16	PM	4/6/2001
6	007	Bottle Finishing (HEST)	6.0 lb_{MBTT}/hr				12/14/2005

*The Size/Rated capacity and PCD efficiency is provided for informational purposes only, and is not an applicable requirement.

EMISSIONS INVENTORY

A copy of the 2010 emission inventory (CEDS) is attached (see Attachment 1). Emissions are summarized in the following tables.

2010 Actual Emissions

	2010 Criteria Pollutant Emission in Tons/Year				
Emission Unit	VOC	CO	SO_2	PM_{10}	NO_x
Total	6.1	0.8	202.7	35.0	224.7

2010 Facility Hazardous Air Pollutant Emissions

Pollutant	2010 Hazardous Air Pollutant Emission in Tons/Yr
HCl	1.2
Pb	0.1

EMISSION UNIT APPLICABLE REQUIREMENTS - [Boiler B-1]

Limitations

The 14.6 MMBtu/hr natural gas-fired boiler [Ref.B-1] was constructed in 1977, has no add-on controls, and is subject to Article 8 of 9 VAC Chapter 40 per 9 VAC 5-50-10 D. Boiler B-1 was constructed prior to June 9,1989, has not been subsequently modified, and is not subject to the provisions of 40 CFR 60 Subpart Dc per 40 CFR 60.40c(a). The Ringgold facility is not a major source of hazardous air pollutants (HAPS) and the boiler [Ref. B-1] is not subject to the existing liquid/gaseous fuel boiler provisions of 40 CFR 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutant (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters per 40 CFR 63.7485. Also the boiler in not subject Subpart JJJJJJ National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources (640 CFR 63.11195(e)) because it only fires natural gas.

Condition III. A.1. states the approved fuels for the boiler (B-1) to be natural gas and LPG.

Condition III. A.2. states the PM and SO_2 emissions limits.

The uncontrolled hourly total PM (filterable plus condensable) emissions from the boiler [Ref. B-1] have been calculated using the PM emission factor (SCC #10200602) from AP42, Section 1.4, Natural Gas Combustion, dated 7/98 to be:

$$PM_{total} = \frac{7.6 \text{ lb}/10^6 \text{ ft}^3}{1000 \text{ Btu}/\text{ft}^3 \times 1 \times 10^6 \text{ ft}^3 / 1 \times 10^6 \text{ Btu}} = 0.0076 \text{ lb/MM Btu}$$

The uncontrolled hourly PM emissions from the boiler (Ref. B-1) would be in compliance with the allowable PM emission of 0.5 lb/MMBtu (0.0076 < 0.5) per 9 VAC 5-40-900(A)(1)(b).

The uncontrolled SO_2 emissions from the boiler [Ref. B-1] have been calculated using the SO_2 emission factor (SCC #10200602) from AP42, Section 1.4 Table 1.4-2, Natural Gas Combustion, dated 7/98 (see Attachment 2) to be:

$$SO_2 \text{ (lb/MMBtu)} = \frac{0.6 \text{ lb}/10^6 \text{ ft}^3}{1000 \text{ Btu/ft}^3 \times 1 \times 10^6 \text{ ft}^3 / 1 \times 10^6 \text{ Btu}} = 0.0006 \text{ lb/MMBtu}$$

The uncontrolled hourly SO_2 emissions from the boiler [Ref. B-1] would be in compliance with the allowable PM emission of 2.64 lb/MMBtu (0.0006 < 2.64) per 9 VAC 5-40-930(A)(1).

Condition III. A.3. states the opacity limitation from the boiler (Ref. B-1) stack (Stack -001). It limits the opacity to less 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity (9 VAC 5-50-80).

Monitoring

Based on the types of fuel (natural gas and LPG) to be combusted in the boiler [Ref. B-1], there is little likelihood of violating the opacity, PM/PM10, and SO_2 limitations. Therefore, as long as the boiler is operated properly it can be assumed that the limitations will not be violated. Maintenance of operating procedures and performance of maintenance in accordance with the maintenance schedule will ensure compliance with the opacity limitation and satisfy the periodic monitoring requirement for the boiler. Therefore, no periodic monitoring is required for the boiler.

Testing

Performance testing for PM, SO2 and opacity for the boiler [Ref. B-1] is not required. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Recordkeeping and Reporting

Boiler B-1 is required to submit an annual emissions update and Title V emissions statement and keep records of the reports. Daily and monthly fuel consumption records are not required. The source is required to maintain records of written operating procedures, operator training, and records of maintenance and operator training.

Streamlined Requirements

None

EMISSION UNIT APPLICABLE REQUIREMENTS - [Batch House and Raw Materials Storage Silos [Ref. 13]]

Limitations

The raw materials are unloaded from truck and rail cars and conveyed to enclosed storage silos in the batch plant (house), which was constructed in 1977. The batch house [Ref. 13] has a rated capacity of 34.3 tons/hr of combined raw materials (see Attachment 3). The 16 raw material silo fabric filters vent into the 5th floor of the batch house, which has windows and a roll-up access door, which are normally open during temperate weather.

The Title V permit includes the following:

Condition IV.A.1. requires that particulate matter (PM, PM-10) emissions from the raw materials storage silos be controlled by fabric filters (from Condition 3 of the NSR Permit issued on April 6, 2001).

Condition IV.A.9 limits the opacity to less than 20% except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity (9 VAC 5-50-80);

Condition IV.A.12 requires proper operation of the fabric filters, written operating procedures, operator training, and records of maintenance and operator training (from Condition 7 of the NSR Permit issued on April 6, 2001).

Monitoring

Table 11.15-5 of AP42, Glass Manufacturing, dated 10/86, indicates that the uncontrolled particulate matter emissions from handling raw material in the Batch House are considered to be negligible (see Attachment 3). Based on the particulate emissions calculations submitted in March 1998 for the original Title V permit the uncontrolled particulate emissions are 0.4 tons/year[1]. . Therefore, Compliance Assurance Monitoring for the Batch House fabric filters is not required per 40 CFR 64(2)(a) since the uncontrolled emissions from materials handling are less than 100 tons/yr..

1. The PM was calculated using the AP-42 table 11.19.2-2 for uncontrolled conveyor transfer point (uncontrolled) emission factor of 0.00294 lb/ton of material. Using the current factor 0f 0.003 times the material throughput of 125,466 tons/yr produces 0.2 tons/yr. Assuming the material is handled twice the uncontrolled PM would be only 0.4 tons/yr.

Condition IV.A. 12
Maintenance of operating procedures and performance of maintenance in accordance with the maintenance schedule will ensure compliance with the opacity limitation and satisfy the periodic monitoring requirement for the fabric filters. As long as the fabric filters are operated properly it can be assumed that the opacity limitation will not be violated. Since the filters exhaust into the 5th floor of the Batch House [Ref. 13], this acts as settling chamber for the PM, an exceedance of the opacity limit is not expected. Therefore, no periodic monitoring is required for the 16 fabric filters in the Batch House. This decision not to require periodic monitoring for the Batch House is consistent with the August 28, 2005 August 10, 2010 Title V permit (renewal) for Owens-Brockway's Toano Plant (Reg. #60923).

Recordkeeping and Reporting

Condition IV.C.
The permittee is required to submit an annual emissions update and Title V emissions statement and keep records of the reports. Monthly and annual throughput records for the Batch House [Ref. 13] are not required. The source is required to maintain records of written operating procedures, operator training, and records of maintenance and operator training.

Testing

Performance testing for PM and opacity for the Batch Plant fabric filter [Ref. 1-16] is not required. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Streamlined Requirements

None.

EMISSION UNIT APPLICABLE REQUIREMENTS - [Melt Furnace [Ref. 1-A]]

There are three federal regulations which apply to glass manufacturing operations.

40 CFR 61, Subpart N (National Emission Standard for Inorganic Arsenic Emissions from Glass Manufacturing Plants) applies to each glass melting furnace that uses commercial arsenic as a raw material. Because Owens-Brockway uses no commercial arsenic in their manufacturing process, their furnace is not affected by this Subpart. The permit shield includes Subpart N as a requirement which has been explicitly deemed to be not applicable to this facility.

40 CFR 63, Subpart SSSSSS Hazardous Air Pollutants for Glass Manufacturing at Area Sources applies to facilities with continuous furnaces to produce glass that contains compounds of one or more glass manufacturing metal HAP (arsenic, cadmium, chromium, lead, manganese, and

nickel) as raw materials in a glass manufacturing batch formulation. This facility does not use any of these HAPs. Therefore their furnace is not affected by this subpart. The permit shield includes Subpart SSSSSS as a requirement which has been explicitly deemed to be not applicable to this facility

40 CFR 60, Subpart CC (Standards of Performance for Glass Manufacturing Plants) applies to each glass melting furnace that commences construction or modification after June 15, 1979. Owens-Brockway's furnace was built prior to the applicability date but modifications to the furnace have triggered Subpart CC. The furnace meets the 40 CFR 60.291 definition of a unit "with modified processes", and is subject to a particulate matter emission limit of 0.5 g/kg (1.0 lb/ton) in accordance with 40 CFR 60.293. However, this standard is less stringent than the particulate emission limit of 0.71 lb/ton imposed as state BACT in the 4/6/01 permit. The more restrictive particulate emission limit in Condition IV.A.6 ensures compliance with both the streamlined NSPS limit and the underlying minor NSR permit limit.

Limitations

Allowable SO_2 emissions were established based on a mass balance, and previous source-specific emission testing indicates that the unit is capable of operating within the allowable limit. Compliance testing for SO_2 was conducted to substantiate the mass balance calculations (see Monitoring below);

Allowable NOx emissions were established based an AP-42 emission factor. Compliance testing for NOx was conducted to substantiate the validity of the emission factor (lb/ton of glass) (see Monitoring below)

Allowable particulate matter (PM-filterable, PM-10-including condensable) emissions were established based on an allowable emission rate of 0.5 g/kg (1.0 lb/ton) in accordance with 40 CFR 60.292 and an actual emission rate of 0.71 lb/ton as demonstrated in the stack test report dated December 1, 1995 (also BACT); this testing provided a demonstration that the furnace is operating in compliance with the applicable emission standard and that the mass balance calculation can be used as a demonstration of continuing compliance. The stack test conducted February 24, 2011 showed PM-10 results of 0.35 lb/ton of glass produced including filterable and condensable PM-10 (see Monitoring below). The melt furnace [Ref. 1-A] does not have add-on controls for particulate matter emissions, so CAM for particulate matter emissions does not apply per 40 CFR 64(2)(a).

Condition IV.A.2. limits the production of pulled glass to 146,000 tons per year (which is equal to average daily production of 400 tons) (from Condition 4 of the NSR Permit issued on April 6, 2001).

Condition IV.A.3. limits the sulfur content of the raw materials fed to the glass furnace to 0.25% by weight (5.0 lb total S as SO_3 per ton of raw material charged to the furnace) (Condition 5 of

the NSR Permit issued on April 6, 2001).

Condition IV.A.5. limits the approved fuel for the glass furnace to natural gas (from Condition 6 of the NSR Permit issued on April 6, 2001).

Condition IV.A.6. limits the hourly and annual PM, PM-10, SO_2, NOx, VOC, and CO emissions from the glass furnace (from Condition 8 of the NSR Permit issued on April 6, 2001).

Condition IV.A.8. limits the opacity to either 13.93% (sources testing conducted on February 24, 2011); or the redetermined opacity value that corresponds to the 99% upper confidence level in accordance with 40 CFR 60.293(e), but shall not to exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity (from Condition 9 of the NSR Permit issued on April 6, 2001).

Condition IV.A.11. states that the melt furnace is subject to the provisions of NSPS Subpart CC (from Condition 10 of the NSR Permit issued on April 6, 2001).

Monitoring

In accordance with NSPS Subpart CC, periodic monitoring requirements for opacity from the melt furnace [Ref. 1-A] are based on continuous opacity monitoring. A stack test for particulate emissions had been run concurrently with the performance evaluation for the COMS. During the test, the opacity value corresponding to the 99% upper confidence level of a normal distribution of average opacity values was established. The opacity limit is the lower of this value or 20% opacity as allowed under state regulation. As required by Subpart CC, 6-minute periods when opacity exceeds the 99% UCL are to be reported as excess emissions. Additional periodic monitoring for the melt furnace [Ref. 1-A] is not required.

Condition IV.B.1. requires a Continuous Opacity Monitoring System (COMS) from Condition 12 of the NSR Permit issued on April 6, 2001.

Condition IV.B.2. requires conducting opacity system monitoring audits from Condition 14 of the NSR Permit issued on April 6, 2001.

The permit also contains limits for SO2, NOx, VOC and CO. These limits were established in accordance with the agency practice of establishing emission limits for any criteria pollutant expected to be emitted at a level greater than 0.5 tons/yr. Although the limits are established as BACT, they are primarily used for emission inventory purposes and conservative emission factors are used to establish the limits. Monitoring of fuel burned, as well a proper operation and maintenance of the furnace is considered adequate for demonstrating compliance with the NOx, VOC, and CO limits.

The SO2 emissions are produced from the sulfur containing compounds in the raw material formulations (e.g. sulfates). The permit has a sulfur content limit of 0.25% by weight of raw material fed to the furnace. Not all of the sulfur in the raw materials is emitted. Some of the sulfur becomes part of the glass and is not emitted. An emissions test for SO2 emission in 2006 showed 2.91 pounds of SO2 per ton of glass produced and in 2011 showed 2.18 pounds of SO2 per ton of glass produced. Recordkeeping of the sulfur content of the raw materials, glass production and a stack test once per permit term is considered adequate for demonstrating compliance with the SO2 limit.

The melt furnace [Ref. 1-A] does not have add-on controls for SO2, NOx, VOC and CO., so CAM does not apply per 40 CFR 64(2)(a).

Recordkeeping

Condition IV.C. requires the permittee to maintain records of annual production of glass pulled from the furnace [Ref. 1-A], sulfur content of each raw material formulation charged to the furnace, monthly emissions calculations for SO2 from the furnace, annual emissions calculated monthly as the sum of each consecutive 12 month period, and operating parameters from Condition 16 of the NSR Permit issued on April 6, 2001.

Testing

Condition IV.D. requires performance testing or PM, SO_2 and NOx from the melt furnace [Ref. 1-A] will be repeated once each permit term, at a frequency not to exceed five years.

Reporting

Condition IV.E. requires written of excess emissions from any process monitored by a continuous monitoring system (COMS) on a semiannual basis.

Streamlined Requirements

The NSPS Subpart CC particulate matter emission limit of 0.5 g/kg (1.0 lb/ton) in accordance with 40 CFR 60.293 is less stringent than the particulate emission limit of 0.71 lb/ton of the 4/6/01 permit. The more restrictive particulate emission limit in Condition IV.A.6 ensures compliance with both the streamlined NSPS limit and the underlying minor NSR permit limit. Therefore, the NSPS Subpart CC particulate matter emission limit has been streamlined out of the Title V permit.

EMISSION UNIT APPLICABLE REQUIREMENTS - [Hot End Surface Treatment (HEST) [Ref. 6]]

Limitations

The HEST process was determined to be a modification to the glass container manufacturing facility that was permitted on December 14, 2005.

Condition IV.A.4 limits the throughput of monobutyltin trichloride (MBTT) to the HEST process [Ref. 6] (from Condition 3 of the NSR Permit issued on December 14, 2005).

Condition IV.A.7. limits the hourly and annual VOC emissions (from Condition 4 of the NSR Permit issued on December 14, 2005).

Condition IV.A.10. limits the opacity to less 10 percent opacity (from Condition 5 of the NSR Permit issued on December 14, 2005).

Monitoring

The HEST process [Ref. 6] does not have add-on controls for VOC emissions and the uncontrolled 8,760 hr/yr VOC emissions are less than or equal to 17.5 tons/yr, so CAM for VOC emissions does not apply per 40 CFR 64(2)(a).

Condition IV.B.3. requires observation of the presence of visible emissions at least one time per week from the HEST process and provides instructions if visible emissions are observed. Record keeping and monthly VOC emissions calculations based on mass balance is sufficient monitoring for VOC emissions from this process.

Recordkeeping

Condition IV.C. requires maintaining MBTT throughput and calculating VOC emissions from the HEST process [Ref. 6]

Testing

Performance testing for VOC emissions and opacity for the HEST process [Ref. 6] are not required. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Streamlined Requirements

None

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

B. Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the *Code of Virginia*, and the "Department of Environmental Quality Agency Policy Statement No. 2-09".

This general condition cite(s) the Article(s) that follow(s):
Article 1 (9 VAC 5-80-50 et seq.), Part II of 9 VAC 5 Chapter 80. Federal Operating Permits for Stationary Sources

This general condition cites the sections that follow:
9 VAC 5-80-80 Application
9 VAC 5-80-140 Permit Shield
9 VAC 5-80-150 Action on Permit Applications

F. Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

J. Permit Modification

This general condition cites the sections that follow:
9 VAC 5-80-50. Applicability, Federal Operating Permit For Stationary Sources
9 VAC 5-80-190. Changes to Permits.
9 VAC 5-80-260. Enforcement.
9 VAC 5-80-1100. Applicability, Permits For New and Modified Stationary Sources

9 VAC 5-80-1605. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas
9 VAC 5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

U. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

This general condition cites the sections that follow:
9 VAC 5-20-180. Facility and Control Equipment Maintenance or Malfunction
9 VAC 5-80-110. Permit Content

Y. Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

STATE ONLY APPLICABLE REQUIREMENTS

None

FUTURE APPLICABLE REQUIREMENTS

There are currently no known future applicable requirements for this facility

INAPPLICABLE REQUIREMENTS

As previously discussed, CAM does not apply to the glass container manufacturing plant's fuel burning or processes emission units per 40 CFR 64(2)(a). The 14.6 MMBtu/hr gas/LPG-fired boiler [Ref. B-1] is not subject to the provisions of National Emission Standards for Hazardous Air Pollutants From for Industrial, Commercial, and Institutional Boilers and Process Heaters and 40 CFR 63 Subpart DDDDD per 40 CFR 63.7490 and 40 CFR 63.7575. The glass process does not use commercial arsenic, so 40 CFR 61 Subpart N does not apply to the melt furnace.

40 CFR 63, Subpart JJJJJJ National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources does not apply to gas-fired boilers (40 CFR 63.11195 (e) and the boiler (B-1) is a gas-fire boiler, therefore Subpart JJJJJJ does not apply to this facility.

40 CFR 63, Subpart SSSSSS Hazardous Air Pollutants for Glass Manufacturing at Area Sources applies to facilities with continuous furnaces to produce glass that contains compounds of one or more glass manufacturing metal HAP (arsenic, cadmium, chromium, lead, manganese, and nickel) as ra materials in a glass manufacturing batch formulation. This facility does not use any of these HAPs. Therefore their furnace is not affected by this subpart. The permit shield includes Subpart SSSSSS as a requirement which has been explicitly deemed to be not applicable to this facility

There are no applicable GHG permitting requirements.

COMPLIANCE PLAN

Not required

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
B-2	North American gas-fired boiler (1978)	9 VAC 5-80-720 C		2.4 MMBtu/hr
2-A	Refiner	9 VAC 5-80-720 C		9.3 MMBtu/hr
3-A	Forehearths (2)	9 VAC 5-80-720 C		0.7 MMBtu/hr, each
4	Annealing Lehrs	9 VAC 5-80-720 C		4.8 MMBtu/hr, max.
5	Bottle Forming (mold dope)	9 VAC 5-80-720 B	PM	
7	Bottle Finishing (polyethylene emulsion)	9 VAC 5-80-720 B	PM	
8	Bottle Coding	9 VAC 5-80-720 B	VOC, HAP (MEK)	
9	Box Coding	9 VAC 5-80-720 B	VOC	
10	Ink Cleaner	9 VAC 5-80-720 B	VOC, HAP (MEK)	
11	Central Vacuum System	9 VAC 5-80-720 B	PM	11
12	Glass Crushers (2)	9 VAC 5-80-720 B	PM	
14	Parts Washer Stations	9 VAC 5-80-720 B	VOC	
16	API Separator	9 VAC 5-80-720 B	VOC, HAP (naphthalene)	
17	Storage Tanks	9 VAC 5-80-720 B	VOC, HAP (benzene, toluene,	

			ethyl benzene, xylene, naphthalene)	
SFL-1	Solid Film Lubricant	9 VAC 5-80-720 B	PM, VOC, HAP (xylene)	
M-1, M-2 & M-3	Mold Heat Ovens	9 VAC 5-80-720 C		0.8 MMBtu/hr, each
18	Diesel Generator (<500 hours/yr)	9 VAC 5-80-720 C		<600 hp
19	Emergency diesel fire pump (<500 hrs/yr)	9 VAC 5-80-720 C		~ 447 hp
20	Box assembly (glue)	9 VAC 5-80-720 B		5 lbs glue/hr

[1]The citation criteria for insignificant activities are as follows:
9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
9 VAC 5-80-720 B - Insignificant due to emission levels
9 VAC 5-80-720 C - Insignificant due to size or production rate

The emergency diesel generator (18) and the emergency diesel fire pump (19) are subject to MACT ZZZZ – National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines, but there are no applicable requirements for these units and they are included are insignificant emissions units in the Title V permit.

CONFIDENTIAL INFORMATION

No information was claimed to be confidential.

PUBLIC PARTICIPATION

The proposed permit was placed on public notice in the Danville Register & Bee from May 10, 2012 to June 9, 2012.